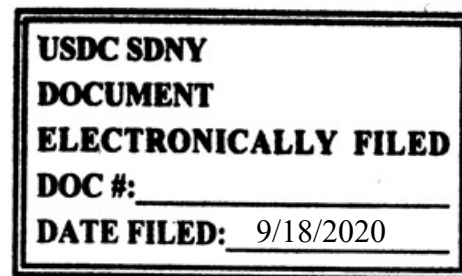


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September 18, 2020

VIA ECF
Honorable Stewart D. Aaron, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rouviere v. DePuy Orthopaedics, et al.
Civil Action No. 1:18-cv-4814 (AJN)

Dear Judge Aaron,

Pursuant to the Local Rules of the Southern District of New York and this Court's procedure, below please find the Plaintiffs, Jodi Rouviere and Andre Rouviere's, Letter Request for an Extension of time to file its expert disclosure. Plaintiffs have been working diligently with an engineer toward completion of its expert report. Not until Thursday night, September 17, 2020 at 10 pm did the expert advise the Plaintiffs that he was not willing to continue as Plaintiffs expert. Plaintiffs have sought the agreement of the Defense to extend the deadline one week. Defendants have refused to an agreement.

Plaintiffs seek one additional week to secure its full complement of experts and file its Expert disclosure. Plaintiffs will be irreparably harmed if it cannot have time to locate a replacement expert.

Accordingly, Plaintiffs respectfully request this Court extend the time to respond to file its Expert Witness Disclosure by one week. This motion is not filed to cause undue delay.

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By: /s/Andre A. Rouviere
ANDRE A. ROUVIERE
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cc: All Counsel of Record (*via ECF*)

ENDORSEMENT: Plaintiffs' Letter Motion (ECF No. 154) states that their "engineer" expert advised them yesterday evening of his unwillingness to continue as an expert. However, Rule 26(a)(2)(B) disclosures separately are required for each of Plaintiffs' experts. Thus, regardless of the Court's decision on Plaintiffs' motion for an extension regarding its "engineer" expert, Plaintiffs shall serve by the 9/21/2020 deadline the required disclosures for any other expert witnesses they may use at trial. Defendants shall file any opposition to Plaintiffs' Letter Motion for an extension of time as to Plaintiffs' "engineer" expert's disclosure no later than 12 noon on Monday, 9/21/2020. SO ORDERED.

Dated: 9/18/2020

A handwritten signature in blue ink, appearing to read "Andre A. Rouviere", is written below the text "Dated: 9/18/2020".